

Joseph G. Went, Esq.  
Nevada Bar No. 9220  
Sydney R. Gambee, Esq.  
Nevada Bar No. 14201  
HOLLAND & HART LLP  
9555 Hillwood Drive, 2nd Floor  
Las Vegas, NV 89134  
Phone: 702-222-2500  
Fax: 702-669-4600  
Email: JGWent@hollandhart.com  
SRGambee@hollandhart.com

*Attorneys for Defendant Synchrony Bank*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Kamaliha Brewster,

Plaintiff,

vs.

Citicorp North America, Inc., Synchrony  
Lending Inc., Trans Union, LLC and Equifax  
Information Services, LLC,

Defendants.

Case No. 2:18-cv-01730

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE RESPONSE  
TO COMPLAINT**

**[SECOND REQUEST]**

COME NOW Plaintiff Kamaliha Brewster (“Plaintiff”) and Defendant Synchrony Bank (erroneously sued as “Synchrony Lending Inc.”) (“Synchrony”), by counsel and pursuant to Local Rule 6-1, and stipulate as follows:

**STIPULATION**

1. On September 9, 2018, Plaintiff filed a Complaint with this Court [ECF No. 1].
2. Synchrony was served with the Complaint on September 14, 2018.
3. Synchrony’s response to the Complaint was originally due by October 5, 2018.
4. On October 5, 2018, the parties filed a Stipulation and Order to Extend Time to Respond to Complaint. [ECF No. 8].
5. On October 11, 2018, the Court issued an Order, granting Synchrony an extension until October 26, 2018 to file a response to the Complaint. [ECF No. 15].

6. The Parties continue to engage in preliminary discussions in this matter. In order to further explore the possibility of an early resolution, Synchrony desires an extension until November 16, 2018, to file a response to the Complaint.

7. Counsel for Synchrony conferred with counsel for Plaintiff regarding this Stipulation. Counsel for Plaintiff agrees to the requested extension.

8. This Stipulation is filed in good faith and not for dilatory or other improper purpose. Plaintiff would not suffer any prejudice by the Court permitting Synchrony the requested extension of time and has consented to the requested extension.

9. This is the second request for extension of time for Synchrony to respond to the Complaint.

DATED: October 26, 2018.

DATED: October 26, 2018.

/s/ Sydney R. Gambee

Sydney R. Gambee, Esq. (NV Bar No. 14201)  
Holland & Hart LLP  
9555 Hillwood Drive, 2nd Floor  
Las Vegas, NV 89134

*Counsel for Defendant Synchrony Bank*

/s/ Michael Kind

Michael Kind, Esq. (NV Bar No. 13903)  
Kazerouni Law Group, APC  
6069 South Fort Apache Road, Suite 100  
Las Vegas, NV 89148

*Counsel for Plaintiff Kamaliha Brewster*

IT IS SO ORDERED.

DATED: Oct 31, 2018

  
C.W. HOFFMAN, JR.

UNITED STATES MAGISTRATE JUDGE